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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Richard Klein, <i>et al.</i> ,)	Case No. 2:22-cv-01392-GMN-BNW
)	
Plaintiffs,)	STIPULATION AND ORDER
)	EXTENDING DEADLINE TO
vs.)	FILE REPLY MEMORANDA IN
)	SUPPORT OF TSI'S AND TRUST
National Collegiate Student Loan Trust)	DEFENDANTS' MOTIONS TO
2005-3, <i>et al.</i> ,)	DISMISS
)	
Defendants.)	(First Request)

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STIPULATION

Plaintiffs, Richard Klein, Raymond Urias and Sandra J. Gunter (“Plaintiffs”), and Defendants, Transworld Systems Inc. (“TSI”), National Collegiate Student Loan Trust (“NCSLT”) 2005-3, NCSLT 2006-3, NCSLT 2007-1, NCSLT 2007-2, and NCSLT 2007-3, and NCSLT 2007-4 (the “Trust Defendants” and, with Plaintiffs and TSI, the “Parties”), by and through their undersigned counsel, hereby jointly stipulate, agree, and move as follows:

1. On March 8, 2023, TSI and the Trust Defendants filed Motions to Dismiss Plaintiffs’ First Amended Complaint (the “Motions to Dismiss”). ECF Nos. 39, 40.

2. On April 19, 2023, Plaintiffs filed their Oppositions to the Motions to Dismiss. ECF Nos. 56, 57.

3. Pursuant to LR 7-2, TSI’s and the Trust Defendants’ reply memoranda are currently due to be filed on April 26, 2023.

4. Due to personal and familial obligations, counsel for TSI and the Trust Defendants require additional time to prepare and file their reply memoranda in support of the Motions to Dismiss.

5. The Parties have conferred and agreed that TSI and the Trust Defendants shall have up to and including May 10, 2023, to file their reply memoranda in support of the Motions to Dismiss.

6. This is the first requested extension by TSI and the Trust Defendants for these filings, which will neither prejudice any party nor unreasonably delay the litigation.

IT IS SO STIPULATED this 20th day of April, 2023.

FREEDOM LAW FIRM

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*to motion for appearance *pro hac vice*

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ORDER

Pursuant to the Parties' stipulation, IT IS HEREBY ORDERED:

TSI and the Trust Defendants shall have up to and including May 10, 2023,
to file reply memoranda in support of their Motions to Dismiss (ECF Nos. 39, 40).

IT IS SO ORDERED:



UNITED STATES DISTRICT JUDGE

DATED: April 21, 2023